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9 IN THE UNITED STATES BANKRUPTCY COURT
10 FOR THE WESTERN DISTRICT OF WASHINGTON

11 In re

12 Jack Carlton Cramer, Jr,

13 Debtor,
14

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16 _____
17 Jack Carlton Cramer, Jr,

18 Plaintiff,
19

20 v.
21

22 21st Mortgage Corporation,
23

24 Defendant.
25
26 _____

Case No. 18-13383-CMA

Adv. Proc. No. 20-01046-CMA

WITHDRAWAL OF DEFENDANT'S
MOTION TO DISMISS PLAINTIFF'S
COMPLAINT TO QUIET TITLE AND
DETERMINE EXTENT AND VALIDITY
OF LIENS PURSUANT TO FRCP 12(b)(6)

23 21st Mortgage Corporation ("21st"), by and through the undersigned counsel,
24 hereby withdraws its Motion to Dismiss Plaintiff's Complaint to Quiet Title and Determine
25 Extent and Validity of Liens Pursuant to FRCP 12(b)(6) [Doc 11] and the following associated
26 documents:

- Declaration of Whit Reed In Support Of Defendant's Motion to Dismiss Plaintiff's Complaint to Quiet Title and Determine Extent and Validity of Liens Pursuant to FRCP 12(b)(6) [Doc 12]
- Defendant's Corrected Motion to Dismiss Plaintiff's Complaint to Quiet Title and Determine Extent and Validity of Liens Pursuant to FRCP 12(b)(6) [Doc 14]

The Motion to Dismiss is moot because the parties have resolved the matter and a stipulated motion to dismiss this proceeding has been filed with the Court.

DATED: August 6, 2020.

TOMASI SALYER MARTIN

By: /s/ Eleanor A. DuBay
Eleanor A. DuBay, WSBA #45828
edubay@tomasilegal.com
Phone: (503) 894-9900
Attorneys for Defendant 21st Mortgage Corporation

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on August 6, 2020, I served a copy of the foregoing
3 **WITHDRAWAL OF DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S**
4 **COMPLAINT TO QUIET TITLE AND DETERMINE EXTENT AND VALIDITY OF**
5 **LIENS PURSUANT TO FRCP 12(b)(6)** by electronic means using ECF to the parties listed
6 below:

7 Christina L Henry on behalf of Plaintiff Jack Carlton Cramer, Jr
8 chenry@hdm-legal.com; HenryDeGraaffPS@jubileebk.net;
9 mainline@hdm-legal.com

10 Rory C Livesey on behalf of Interested Party Courtesy NEF
11 rory@liveslaw.com, patti@liveslaw.com

12 DATED: August 6, 2020.

13 TOMASI SALYER MARTIN

14 By: /s/ Eleanor A. DuBay
15 Eleanor A. DuBay, WSBA #45828
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17 Phone: (503) 894-9900
18 Attorneys for Defendant 21st Mortgage
19 Corporation
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CERTIFICATE OF SERVICE
21ST-F74\00526260.000

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